

evidence any type of agreement or understanding between you and Presbyterian Espanola Hospital pertaining to the provision of medical attention to any person within your custody, including your need to obtain a medical clearance prior to transporting persons with medical needs to jail.

RESPONSE:

Not applicable.

Plf.'s Request for Production No. 11 to Espanola Defs.: Produce all documents evidencing any type of grievance, complaint, internal affairs investigation, or disciplinary action involving Defendants Joseph Salazar or Greg Esparza.

RESPONSE:

Not applicable.

Plf.'s Request for Production No. 12 to Espanola Defs.: all documents evidencing the use of force by Defendants Joseph Salazar or Greg Esparza on any individual.

RESPONSE:

See, Uniform Incident Report, Incident Narrative 12-05-129, Espanola Police Incident Report & Espanola Police Department Receipt for Evidence, attached hereto as City Def 000111-000124.

Plf.'s Request for Production No. 13 to Espanola Defs.: Produce all documents you reviewed as part of your decision-making process in deciding to hire Defendants Joseph Salazar and Greg Esparza, including these Defendants' applications for employment, letters of reference, and